

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

AMAZON.COM SERVICES LLC,

Plaintiff,

vs.

NATIONAL LABOR RELATIONS BOARD, a federal administrative agency, JENNIFER ABRUZZO, in her official capacity as the General Counsel of the National Labor Relations Board, LAUREN M. MCFERRAN, in her official capacity as the Chairman of the National Labor Relations Board, and MARVIN E. KAPLAN, GWYNNE A. WILCOX, and DAVID M. PROUTY, in their official capacities as Board Members of the National Labor Relations Board,

Defendants.

Civil Action No. 5:24-cv-01000

DECLARATION OF TYLER GRABOWSKI

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I, Tyler Grabowski, declare as follows:

1. My name is Tyler Grabowski. I am over eighteen years of age and make the following declaration of my own free will. I have not been promised any benefit or coerced or threatened in any manner in exchange for the statements in this declaration. I have personal knowledge of the matters set forth herein, and if called upon to do so, could and would testify competently thereto.

2. I currently work for Amazon.com Services LLC (“Amazon”) as a Senior Human Resources Manager at its JFK8 Fulfillment Center in Staten Island, New York (“JFK8”).

3. As a Senior Human Resources Manager, I have general knowledge regarding Amazon’s operations and employment-related matters at JFK8, including the circumstances surrounding the union election that was conducted at JFK8 in March 2022.

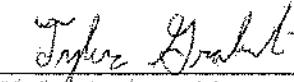
4. Amazon operates websites and physical stores that sell various products, including books, home goods, toys, electronics, and apparel. Amazon facilities receive and sort packages and ship assorted products from warehouses called Fulfillment Centers. Amazon operates a Fulfillment Center in Staten Island, New York called “JFK8.”

5. On April 2, 2022, the Amazon Labor Union (“ALU”) requested that Amazon bargain collectively with the ALU as representative of the employees at JFK8.

6. Amazon terminated employee Gerald Bryson (“Bryson”) in May 2020 for making vulgar and derogatory comments toward another employee. Attached hereto as **Exhibit 1** is a true and correct copy of the notice Bryson received of his termination.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of September, 2024.



Tyler Grabowski

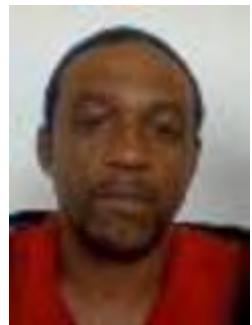
EXHIBIT 1

Refused to sign by associate on April 17, 2020, 12:38:40 PM - Delivered by Sushalskyy,Sergiy (sushalsk)

Supportive Feedback Document Behavioral - Termination



Associate Name: BRYSON,GERALD Joseph (gbbryso)
Manager Name: Pryce,Bertram (DB3-0700)
Created On: April 17, 2020, 12:38:40 PM



Summary

Your recent job performance is not meeting Behavioral expectations. Meeting performance standards is a critical component of your job. This document provides specific details about your performance and how you are not meeting expectations.

Communication History

The following is a summary of your behavioral feedback:

Details of Current Incident/Specific Concerns

The following feedback pertains to Amazon's Standards of Conduct. Abusive, vulgar, or harassing language to a supervisor, fellow associate, or vendor is prohibited and classified as a Category 2 violation of the Standards of Conduct. Harassment is unwanted conduct that affects one's dignity at work. It is personally offensive and creates an intimidating, hostile, degrading, humiliating or offensive work environment. On 4/6/2020, you were reported to be in violation of this policy by making vulgar and derogatory comments towards another employee.

Areas of Improvement Required by Associate

Amazon is committed to providing a work environment that promotes the health, safety, and productivity of its associates. Associates are expected to treat each other, contractors, customers, and visitors with courtesy and professionalism. Amazon will not tolerate abusive, vulgar, or harassing language or behavior. You are expected to be in compliance with the Standards of Conduct policy at all times while working in the Fulfillment Center. These actions result in separation of employment.

Associate Comments

I acknowledge that I have been informed of my right to appeal this feedback if I meet all eligibility requirements defined by the Appeals Policy, and that I know where to obtain an appeals packet.

Termination was delivered over the phone. Associate was informed that they will not be able to appeal this decision based on the Amazon policy. Associate refused to sign the document, however requested it to be sent over email.

Associate Signature: BRYSON,GERALD Joseph REFUSED TO SIGN

Date: April 17, 2020, 12:38:40 PM

Manager Signature: Acknowledged by Sushalskyy,Sergiy (BadgeID: 11196847)

Date: April 17, 2020, 12:38:40 PM